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PERRY PAZER
OF COUNSEL
The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: Creighton v. City of New York, et al.
12 CV 7454 (PGG)

Your Honor:

Counsel write jointly regarding the schedule for filing the Joint Pre-Trial Order and other pre-trial submissions.

In light of the pending summary judgment motions, counsel jointly request that the Court adjust the pre-trial submission dates pursuant to ¶10(A) of the Your Honor's Individual Rules of Practice.

Briefing on the parties' respective summary judgment motions is underway, with the motions papers to be filed later this month under the Court's bundling rule. Under the current schedule, the Joint Pre-Trial Order, motions *in limine*, proposed voir dire, charges, and verdict sheet are to be submitted by August 1, 2016, with response to *in limine* motions filed by August 8, 2016.

Your Honor's Individual Rules of Practice, ¶10(A), states that, where dispositive motions are made, the Joint Pre-Trial Order should not be submitted until thirty days after a decision on the motions.

The summary judgment motion will impact what issues and which parties remain for trial, and the Joint Pre-Trial Order, motions *in limine*, voir dire, charges, and verdict sheet will need to account for the Court's rulings.

Counsel, therefore, jointly respectfully request that the time to submit the Joint Pre-Trial Order, motions *in limine*, charges, and verdict sheet be extended to thirty days from the date on which Your Honor rules on the summary judgment motions.

We thank the Court for its consideration herein.

Respectfully submitted,

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